

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE FOOTBALL ASSOCIATION PREMIER)
LEAGUE LIMITED, BOURNE CO., et al.,)
on behalf of themselves and all)
others similarly situated,)
)
Plaintiffs,)
vs.)
)
) NO. 07-CV-3582
)
YOUTUBE, INC., YOUTUBE, LLC, and)
GOOGLE, INC.,)
)
Defendants.)
)

VIDEOTAPED DEPOSITION OF
KEITH HAUPRICH
NEW YORK, NEW YORK
THURSDAY, SEPTEMBER 24, 2009

BY: REBECCA SCHAUMLOFFEL
JOB NO. 17720

Figueira Decl. Tab

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KEITH HAUPRICH

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technology.

Q. When did Cherry Lane first become aware of YouTube's fingerprinting technology?

A. I believe I found something that I submitted my interest in the form of an E-mail or a click here, maybe in October of 2007. It was a link I found that said click here for your -- you know, if you are interested in video identification services on YouTube.

A month later, I got an E-mail back asking me for further information as to what I meant by I was interested and that's what tipped off the letter writing campaign.

Q. And have you had communications with YouTube regarding the fingerprinting technology to monitor YouTube?

A. I have observed -- excuse me. I have observed a PowerPoint presentation, generally, about the